## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA, : CASE NO. 1:17CR006

Plaintiff, :

: JUDGE JAMES S. GWIN

VS.

.

BRIAN C. KEELING, : **DEFENDANT BRIAN KEELING'S** 

UNOPPOSED MOTION TO

Defendant. : CHANGE SENTENCING DATE

The defendant Brian C. Keeling, through counsel, hereby moves this Honorable Court for an Order changing the date of the sentencing hearing scheduled June 27, 2017, to either June 13<sup>th</sup>, June 14<sup>th</sup>, or June 15<sup>th</sup>, 2017. Assistant United States Attorney Michael Sullivan has no objection to this motion and is available on the proposed dates.

On April 18, 2017, undersigned counsel filed an unopposed motion to continue sentencing hearing. (Dkt. 13). On April 19, 2017, this Honorable Court granted the motion (Order - non-document). The reason is that undersigned counsel has a conflict with her schedule. Counsel was not able to verify that she was to attend the Administrative Office Supervisor's Training scheduled for June 26- 30, 2017, until after the court's ruling. The request for this continuance is made in the interest of justice and not for needless delay.

Therefore, undersigned counsel, respectfully requests this Honorable Court grant this motion and change the date of the sentencing hearing.

Respectfully submitted,

STEPHEN C. NEWMAN Federal Public Defender Ohio Bar: 0051928

s/ JACQUELINE A. JOHNSON
JACQUELINE A. JOHNSON
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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2017, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

s/ JACQUELINE A. JOHNSON
JACQUELINE A. JOHNSON
First Assistant
Federal Public Defender